

**UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
ASHEVILLE DIVISION**

IN RE:

**EDITHA P. JUSTICE
SSN: XXX-XX-5984**

**Case No. 10-10431
Chapter 7**

Debtor

**MOTION FOR EX PARTE ORDER REOPENING CASE
TO EXTEND TIME FOR FILING A REAFFIRMATION AGREEMENT**

NOW COMES the above-named debtor by and through counsel, and respectfully moves the Court pursuant to Section 350(b) of Title 11 of the United States Code, Rule 9024 of the Rules of Bankruptcy Procedure and Rule 60 of the Federal Rules of Civil Procedure for the entry of an ex parte order to REOPEN this case in order for the debtor to file a motion to extend time for filing a reaffirmation agreement and to timely file a fully executed reaffirmation agreement.

THE DEBTOR respectfully shows unto this Court that an Order of Discharge of Debtor and a Final Decree closing the case was duly entered in this proceeding on or about July 27, 2010. The debtor wishes to reopen the case to be able to file a motion to extend the time for filing a reaffirmation agreement, to file a fully executed reaffirmation agreement and to receive a discharge with the benefits that a discharge entails. Once this motion has been filed, so ordered, and a fully executed reaffirmation agreement has been timely filed, a Final Decree closing the case can be issued and the case can be re-closed.

THE DEBTOR is informed and believes and therefore alleges that it would be in the interest of justice to reopen this case and allow the debtor to proceed with the legal action described and she so moves the Court for such relief and for such additional relief as the Court may deem just and proper.

This the 6th day of October, 2010.

/s/ Joshua B. Farmer

Joshua B. Farmer, NC Bar #: 32669

TOMBLIN, FARMER & MORRIS, PLLC

Attorney for Debtor

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CERTIFICATE OF SERVICE

I, Joshua B. Farmer of TOMBLIN, FARMER & MORRIS, PLLC, hereby certify that a copy of the foregoing MOTION FOR EX PARTE ORDER REOPENING CASE TO EXTEND TIME FOR FILING A REAFFIRMATION AGREEMENT was served via electronic filing through the US Bankruptcy Court or by depositing a true and exact copy in an official repository of the United States Postal Service in a postage paid envelope addressed to the following:

Editha P. Justice
671 Mountain Road
Hendersonville, NC 28791

American Honda Finance Corporation
ATTN: Chad Golston
PO Box 168088
Irving, TX 75016-8088

*Robert M. Pitts, Trustee
(via electronic notice)*

*Bankruptcy Administrator
(via electronic notice)*

This the 6th day of October, 2010.

/s/Joshua B. Farmer

Joshua B. Farmer, NC Bar #: 32669
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